

May 28, 2020 Teleconference Meeting Notes: EPA and Hartz Mountain Corporation

Participants

- Hartz Mountain Corporation: William Fornshell, Yas Takada, Joe Conti, Jeff Driver (Consultant, Risk Sciences), Michael Boucher (attorney, Crowell & Moring)
- EPA: Elissa Reaves (Acting Division Director, PRD), Billy Smith (Deputy Director, PRD), Dana Friedman (Branch Chief, PRD), Patricia Biggio (CRM), Kelly Lowe (HED), Mike Meztger (Branch Chief, HED), Wade Britton (HED), Dana Vogel (Division Director, HED), Jeff Dawson (IO), Tom Harty (BEAD), Ben Wakefield (OGC), Michele Knorr (OGC), Erin Koch (OGC)

On May 28, 2020 representatives of EPA and Hartz Mountain Corporation (Hartz) spoke by phone to discuss the proposed mitigation measures that Hartz provided via email on May 27, 2020.

At the start of the meeting, the agency clarified that EPA has not agreed to any mitigation nor is the agency agreeing to allow any registration to remain in full effect at this time and that negotiations are currently ongoing. The agency highlighted sections of Hartz's proposal for continued discussion:

- The EPA will need information on the impact of the redesign on the risk estimates.
- The agency noted that it will need confirmation of efficacy of redesigned collars.
- Hartz discussed reductions in length and weight of the collar and said that the collar will contain the same percentage of active ingredient. The trimming amount is expected to be the same.
- The EPA inquired about timing for the cat collar label amendments.
- The EPA is looking into the proposed sell-off period for the voluntary cancellation of dust powders.
- In anticipation of retailers returning voluntarily cancelled products, there should be a Provision for Hartz to take the material back.